

Joseph N. Kravec, Jr. (*pro hac vice*)
 STEMBER FEINSTEIN DOYLE PAYNE &
 CORDES
 429 Forbes Avenue
 Allegheny Building, 17th Floor
 Pittsburgh, Pennsylvania 15219
 Telephone: (412) 281-8400
 Facsimile: (412) 281-1007
 jkravec@stemberfeinstein.com

James M. Pietz (*pro hac vice*)
 PIETZ LAW OFFICE
 Mitchell Building
 304 Ross Street, Suite 700
 Pittsburgh, PA 15219
 Telephone: (412) 288-4333
 Facsimile: (412) 288-4334
 Email: jpietz @jpietzlaw.com

Stephen F. Yunker (Bar No. 110159)
 YUNKER & SCHNEIDER
 655 West Broadway, Suite 1400
 San Diego, California 92101
 Telephone: (619) 233-5500
 Facsimile: (619) 233-5535
 sfy@yslaw.com

Attorneys for Plaintiff MICHELLE T. WAHL

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

MICHELE T. WAHL, on behalf of herself and
 all others similarly situated,

Plaintiff,

v.

AMERICAN SECURITY INSURANCE
 COMPANY; and DOES 1-50, inclusive,

Defendant.

Peter S. Hecker (Bar No. 66159)
 Anna S. McLean (Bar No. 142233)
 SHEPPARD MULLIN RICHTER & HAMPTON, LLP
 Four Embarcadero Center, Seventeenth Floor
 San Francisco, CA 94111-4109
 Telephone: (415) 774-3155
 Facsimile: (415) 403-6224
 phecker@sheppardmullin.com
 amclean@sheppardmullin.com

Frank Burt (*pro hac vice*)
 Denise A. Fee (*pro hac vice*)
 JORDEN BURT LLP
 1025 Thomas Jefferson Street, NW
 Suite 400 East
 Washington, DC 20007-0805
 Telephone: (202) 965-8140
 Facsimile: (202) 965-8104
 fgb@jordenusa.com
 daf@jordenusa.com

Attorneys for Defendant AMERICAN SECURITY
 INSURANCE COMPANY

Case No. C08-00555-RS

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~
 ORDER FOR CONSOLIDATED
 HEARING TIME**

1 The parties, by their undersigned counsel, hereby submit the following stipulation and
2 proposed order for entry by this Court pursuant to Local Rule 7-12:

3 1. In its May 10, 2010 Order Granting in Part and Denying in Part Defendant's Motion
4 for Judgment on the Pleadings and Granting Plaintiff's Motion for Class Certification, Doc. No.
5 131, the Court directed the parties to appear at a Case Management Conference on **July 15, 2010 at**
6 **10:00 a.m.**

7 2. On May 24, 2010, defendant filed: (1) a Motion for Leave to File a Motion for
8 Reconsideration and, or in the Alternative, to Amend Order to Provide for Certification of
9 Interlocutory Appeal, as well as (2) a Motion for Clarification of the Court's Order Dated May 10,
10 2010, and Stay of the Preparation and Dissemination of Class Notice.

11 3. The hearing date and time scheduled for both of these Motions is **July 15, 2010 at**
12 **1:30 p.m.**, as contemplated by the Court's normal practice for hearing motions on its civil docket.

13 4. It would be convenient for the parties, and also may be in the interests of judicial
14 economy, to consolidate the times for the Case Management Conference and for the hearing on
15 defendant's pending Motions.

16 5. No change in the date of the Case Management Conference or the hearing on the
17 Motions is contemplated or required.

18 WHEREFORE, the parties respectfully request that the Court order as follows:

19 The hearing time on defendant's pending Motions is reset to **July 15, 2010 at 10:00 a.m.**, to
20 be consolidated with the Case Management Conference.

21 Dated: June 4, 2010

SEEN AND AGREED:

STEMBER FEINSTEIN DOYLE PAYNE
& CORDES

JORDEN BURT LLP

By: /s/ Joseph N. Kravec, Jr. (with consent)
Joseph N. Kravec, Jr.

By: /s/ Frank G. Burt
Frank G. Burt

Joseph N. Kravec, Jr. (*pro hac vice*)
STEMBER FEINSTEIN DOYLE PAYNE &
CORDES
429 Forbes Avenue
Allegheny Building, 17th Floor
Pittsburgh, Pennsylvania 15219
Telephone: (412) 281-8400
Facsimile: (412) 281-1007
jkkravec@stemberfeinstein.com

Frank Burt (*pro hac vice*)
Denise A. Fee (*pro hac vice*)
JORDEN BURT LLP
1025 Thomas Jefferson Street, NW
Suite 400 East
Washington, DC 20007-0805
Telephone: (202) 965-8140
Facsimile: (202) 965-8104
fgb@jordenusa.com
daf@jordenusa.com

James M. Pietz (*pro hac vice*)
PIETZ LAW OFFICE
Mitchell Building
304 Ross Street, Suite 700
Pittsburgh, PA 15219
Telephone: (412) 288-4333
Facsimile: (412) 288-4334
Email: jpietz@jpietzlaw.com

Peter S. Hecker (Bar No. 66159)
Anna S. McLean (Bar No. 142233)
SHEPPARD MULLIN RICHTER & HAMPTON, LLP
Four Embarcadero Center, Seventeenth Floor
San Francisco, CA 94111-4109
Telephone: (415) 774-3155
Facsimile: (415) 403-6224
phecker@sheppardmullin.com
amclean@sheppardmullin.com


Stephen F. Yunker (Bar No. 110159)
YUNKER & SCHNEIDER
655 West Broadway, Suite 1400
San Diego, California 92101
Telephone: (619) 233-5500
Facsimile: (619) 233-5535
sfy@yslaw.com

Attorneys for Defendant AMERICAN SECURITY
INSURANCE COMPANY

Attorneys for Plaintiff MICHELLE T. WAHL

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: 6/4, 2010


The Honorable Richard Seeborg
United States District Judge